

# EXHIBIT C

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK

LAMAR BROWN,

Plaintiff,

v.

Civil Action No. 1:22-cv-06086

PRO-SOURCE PERFORMANCE  
PRODUCTS, INC.,

Defendant.

**DECLARATION OF ROBERT KINGETT**

I, Robert Kingett, being over the age of 18 years old, having been duly sworn, hereby declare that if called upon, I could testify to the following facts based on personal knowledge:

1. I am over the age of 18 and of sound mind, and have personal knowledge of the matters set forth herein.

2. I am totally blind and use screen reader software.

3. I use screen reader technology in my daily life.

4. I was hired by Pro-Source Performance Products, Inc. (“Pro-Source”) to review [www.prosource.net](http://www.prosource.net) (“Website”) on August 31, 2022 and previously in May of 2022.

5. On August 31, 2022, every part of the Website I reviewed with my screen reader was accessible.

6. During my review of the Website using a screen reader, I was able to use the Website and learn about Pro-Source’s business, accessibility statement and contact information. My screen reader further read the links for sub-menus on the Website’s homepage so I could go to various categories of interest, my screen reader described the images on the Website, I was immediately taken to the shopping cart after selecting an item, my screen reader read the links

found for promotional advertisements, properly read out pricing information on products, product descriptions for individual products, I could learn about articles on the website and I was able to learn about and go through the steps to order product.

7. A video was made of me reviewing the Website on August 31, 2022.

8. Attached as Exhibit 1 to this Declaration is a true and accurate copy of that video.

9. The Website is accessible and a visually impaired individual should be able to use the Website if they actually know how to use a screen reader.

10. Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing statements are true.

FURTHER DECLARANT SAYETH NAUGHT

*Robert Kingett*

Robert Kingett

Date: 8/31/2022